

REMARKS

Claims 12-18, 21, 22, 24, 25, 27-33, and 35-37 are pending.

Claims 1-11, 19, 20, 23, 26, and 34 have been cancelled.

New claims 38-42 have been added.

In the Office Action dated October 29, 2008, claims 12-17, 25, 26, 28, 32, and 34-36 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,839,747 (Blumenau) in view of U.S. Patent No. 6,212,606 (Dimitroff); and claims 18, 21, 22, 24, 27, 28-31, 33, and 37 were rejected under 35 U.S.C. § 103(a) as unpatentable over Blumenau in view of Dimitroff and U.S. Patent Application Publication No. 2004/0032430 (Yung).

REJECTION OVER BLUMENAU & DIMITROFF

Claim 12 has been amended to incorporate the subject matter of former dependent claim 34.

Former claim 34 recites:

- monitoring for a change in a state of the storage system devices; and
- in response to the change, modifying the logical map.

The Office Action grouped the rejection of claim 34 with independent claims 12 and 25. However, the rejection does not address the explicit elements of these claims. More specifically, the Office Action failed to explain how Blumenau and Dimitroff disclose or hint at the above combination of elements.

Nothing in Blumenau provides any hint of monitoring for a change in a **state of the storage system devices**, and in response to the change, modifying the logical map. Dimitroff also does not provide any hint of the above subject matter. Therefore, it is respectfully submitted that claim 12 is non-obvious over Blumenau and Dimitroff.

Independent claim 25 has been amended to incorporate the subject matter of former claim 26. Such subject matter was also rejected as purportedly obvious over Blumenau and Dimitroff.

Blumenau does not disclose or hint that received device information relating to storage system devices includes at least one of numbers and types of storage system devices operatively associated with storage system devices, and capacities of storage system devices. This point was implicitly conceded by the Office Action, since the Office Action cited Dimitroff as purportedly

disclosing the subject matter of former dependent claim 26. The Office Action specifically cited to the following passages of Dimitroff: col. 2, line 57-col. 3, line 54; col. 4, lines 6-67; col. 5, lines 1-60. The passage in columns 2 and 3 of Dimitroff refers to classifying parametrics associated with storage units into standardized shared levels. However, there is no teaching in this passage of receiving device information including at least one of numbers and types of storage system devices and capacities of storage system devices, and generating a logical map based on such received information.

The cited columns 4-5 passages of Dimitroff also refer to assignment of storage units to different shared levels. However, there is no teaching or hint of using numbers and types of storage system devices or capacities of storage system devices to generate a logical map.

In view of the foregoing, it is respectfully submitted that since the hypothetical combination of Blumenau and Dimitroff would not have led to the claimed subject matter, the obviousness rejection of the subject matter of claim 25 is in error.

REJECTION OVER BLUMENAU, DIMITROFF, AND YUNG

Independent claim 21 was rejected as being obvious over Blumenau, Dimitroff, and Yung.

It is respectfully submitted that no reason existed that would have prompted a person of ordinary skill in the art to combine the teachings of Blumenau, Dimitroff, and Yung. *KSR International Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 1741, 82 U.S.P.Q.2d 1385 (2007). While Dimitroff is related to defining standardized share levels for different storage units, and Blumenau is related to managing the availability and assignment of data in a storage system, Yung is related to providing a user interface “for relatively large biological laboratories that have many instruments of different types.” Yung, Abstract. Since the teachings of Dimitroff, Blumenau, and Yung are directed to very different applications, it is respectfully submitted that a person of ordinary skill in the art would not have been prompted to combine the teachings of Dimitroff, Blumenau, and Yung to achieve the claimed invention. The obviousness rejection is therefore defective for at least this reason.

Moreover, the hypothetical combination of the references does not disclose or hint at the following feature of claim 21: the interface manager is to generate a logical map of the

automated storage system based on aggregating configuration information for the data access drives and transfer robotics, wherein the logical map is used by hosts to allow access of the data access drives and the transfer robotics by the hosts. Although Yung discloses instruments that include sample storage devices and sample transfer robotics, the "sample" refers to a biological sample for biological analysis. Thus, Yung clearly does not contemplate aggregating configuration information for data access drives (that access data on storage media) and transfer robotics (that transfer data storage media in a storage system).

Therefore, even if Blumenau, Dimitroff, and Yung could be hypothetically combined, the hypothetical combination would not have led to the claimed subject matter. Therefore, claim 21 is non-obvious over the cited references.

CONCLUSION

Dependent claims, including newly added dependent claims 38-42, are allowable for at least the same reasons as corresponding independent claims 12 and 25. Moreover, in view of the allowability of base claims, it is respectfully submitted that the obviousness rejection of dependent claims has been overcome.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 08-2025 (200315416-1).

Respectfully submitted,



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